

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

**OLIVIA Y., By and
Through Her Next Friend,
James D. Johnson, et al.**

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN

**HALEY BARBOUR,
As Governor of the State of Mississippi;
DONALD TAYLOR, as Executive Director
of the Department of Human Services; and
BILLY MANGOLD, as Director of the Division
of Children's Services**

DEFENDANTS

DEFENDANTS' INITIAL DISCLOSURES TO PLAINTIFFS

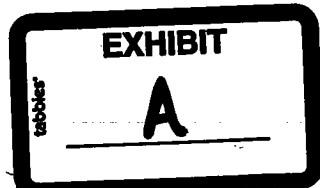
COME NOW the Defendants, Haley Barbour, as Governor of the State of Mississippi; Donald Taylor, as Executive Director of the Department of Human Services; and Billy Mangold, as Director of the Division of Family and Children's Services, by and through counsel, and file their Initial Disclosures to Plaintiffs, pursuant to Fed. R. Civ. Pro. 26(a)(1) and Local Rule 26.1(A)(1) and submit the following:

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that Defendants may use to support their claims or defenses, unless solely for impeachment:

1. Regarding Olivia Y.

(a) All members of Olivia Y.'s biological family, including:

Peggy Yarbrough, biological mother
301 Parksdale Drive
Hattiesburg, MS 39403 (last known address)
Telephone number unknown



Otha Terrance Donald, biological father
Address and telephone number unknown

Melvin Yarbrough,father
Address and telephone number unknown

Carolyn Hunter, aunt
Address and telephone number unknown

Amelia Yarbrough, sister
301 Parksdale Drive
Hattiesburg, MS 39403 (last known address)
Telephone number unknown

Haley Yarbrough, sister
581 Richburg Road
Purvis, MS 39475
Telephone number unknown

Gene Hunter, cousin
Address and telephone number unknown

Willena Harris, aunt
Address and telephone number unknown

- (b) All current or former members of Olivia Y.'s foster families, including:

Seaborn and Annette Rainey
581 Richburg Road
Purvis, MS 39475
Telephone number unknown

Ethel Jones
Address and telephone number unknown

- (c) All current or former DHS personnel or agents who have been involved with Olivia Y., including:

Mickel Hodges
DEPARTMENT OF HUMAN SERVICES
DIVISION OF FAMILY AND CHILDREN SERVICES
750 North State St.
Jackson, MS 39202
(601) 359-4500

Mechille Henry, Acting Regional Director
MARION COUNTY DEPARTMENT OF HUMAN SERVICES
226 Broad St., Suite 1
Columbia, MS 39429
(601) 736-6044

Jean Fertitta, Area Social Worker Supervisor
Nicole Holloman
Jennifer McLaurin, LSW
Jessie Richardson, homemaker
Deborah Stewart, Area Social Worker Supervisor
Marie Turnage, LSW
Christina Morrison
Kim Rider
Barry Robertson
FORREST COUNTY DEPARTMENT OF HUMAN SERVICES
1604 West Pine Street
Hattiesburg, MS 39401
(601) 554-4354

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*, or Court Appointed Special Advocates who have been involved with Olivia Y., including:

Judge Michael W. McPhail
FORREST COUNTY YOUTH COURT
P.O. Box 190
Hattiesburg, MS 39403
(601) 545-6075

James D. Johnson, Esq.
Guardian *Ad Litem*
301 W. Pine St.
Hattiesburg, MS 39401
(601) 583-1937

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with Olivia Y., including:

Emma Foster
PINEBELT ASSOCIATION FOR COMMUNITY ENHANCEMENT (PACE)
HEADSTART PROGRAM
710 Katie Ave.
Hattiesburg, MS 39401
(601) 545-8110

Terry Latham, Director
Valerie Edenfield, Assistant Shelter Manager
HOPE HAVEN CHILDREN'S SHELTER
P.O. Box 37
Bay St. Louis, MS 39520
(228) 467-7945

Dr. Shama Shakir
COASTAL FAMILY HEALTH CENTER
P.O. Box 475
Biloxi, MS 39533
(228) 374-2474

(f) Other

Ava Cobbins
MISSISSIPPI DEPARTMENT OF HEALTH
Post Office Box 1700
Jackson, MS 39215-1700
(601) 576-7400

2. Regarding Jamison J.

(a) All members of Jamison J.'s biological family, including:

Daniel Hysten, biological father
1956 South Laura
Wichita, KS 67211
(316) 806-4356

Toshelia Lewis, sister
6562 Lyndon B. Johnson Drive
Jackson, MS 39213
(601) 981-4077

Shaka McCorker, sister
Address and telephone number unknown

Ruthie Davis, maternal grandmother
Address and telephone number unknown

Lloyd and Rosie Hysten, paternal grandparents
7425 Berryton
Berryton, KS 66409
(913) 862-9076

Sharon Wells, friend of family
Address and telephone number unknown

- (b) All current or former members of Jamison J.'s foster families, including:

Charlie and Ora Groves
Doddsville, MS
Address and telephone number unknown

Jodie Felton
923 Parkview Street
Cleveland, MS 38732
(662) 843-2061

Mrs. Murphy
Cleveland, MS
Address and telephone number unknown

LaVance and Diane Body
6665 Lake Forest Drive
Jackson, MS 39206
(601) 354-1403

James Hennington
Jackson, MS
Address and telephone number unknown

Alice Mayers
Address and telephone number unknown

Orlean Wolfe
Address and telephone number unknown

Clara Lewis
6562 Lyndon B. Johnson Drive
Jackson, MS 39213
(601) 981-4077

- (c) All current or former DHS personnel or agents who have been involved with Jamison J., including:

Billy Mangold, Division of Family and Children's Services
Gwen Walker, LSW
Ann Pullum, Administrator, Interstate Compact Placement
Jeff Wedgeworth, Acting Director, Protection Unit

Gail Young, Director Placement Unit
Mary Ann Cooper
Sharon L. Worley, LSW
DEPARTMENT OF HUMAN SERVICES
DIVISION OF FAMILY AND CHILDREN SERVICES
750 North State St.
Jackson, MS 39202
(601) 359-4500

Maggie Mixon, Area Social Worker Supervisor
HINDS COUNTY DEPARTMENT OF HUMAN SERVICES
4777 Medgar Evers Blvd.
Jackson, MS 39213
(601) 362-9892

Martha McDaniel, Regional Director
Region II – Division of Family and Children Services
GRENADA COUNTY DEPARTMENT OF HUMAN SERVICES
1241 S. Mound St.
Grenada, MS 38902
(662) 226-1351

Deon Thomas, LSW
RANKIN COUNTY DEPARTMENT OF HUMAN SERVICES
603 Marquette Road
Brandon, MS 39042
(601) 825-7210

Lucille Ivy, LSW
Mitsi Pilgrim, LSW
Mary Wallace, LSW
Reginald Walker, LSW
Tracey Modhzain, LSW
Annie Smith, LSW
Queen Coleman, Area Social Worker Supervisor
Terry Hall, Area Social Worker Supervisor
EAST BOLIVAR COUNTY DEPARTMENT OF HUMAN SERVICES
P.O. Box 367
Cleveland, MS 38732
(662) 843-0294

Jill Blount
Myrt G. Grisham
Stanley B. Lee
Tommie Clinton
Michele Love

Kim O'Neal
Sha Aguzzi
J.D. Cummys
M. Williams
Ruby W. Robinson
Elisha Langdon
Cathy Caudwell
Johnnie Johnson
Roosevelt Grenell
Rosie Johnson
Lorie Smith
Pattie C. Hendricks
Michael W. Hendricks
E.J. Doblinson
Mose James
Jan Vaughn
Carolyn Dodge
DEPARTMENT OF HUMAN SERVICES
DIVISION OF FAMILY AND CHILDREN SERVICES
FOSTER CARE REVIEW PROGRAM
750 North State Street
Jackson, MS 39202
(601) 359-4500

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*, or Court Appointed Special Advocates who have been involved with Jamison J., including:

Judge Kenneth Thomas
Bolivar County Circuit Court Judge
P.O. Box 548
Cleveland, MS 38732-0548
(662) 846-2939

Judge Patricia D. Beckett
Senior Status Judge
P.O. Box 1644
Cleveland, MS 38732
(662) 843-4511

Judge Gwendolyn J. Thomas
Bolivar County Youth Court Judge
P.O. Box 188
Cleveland, MS 38732
(662) 843-7175
(Also served as Guardian *Ad Litem*)

Albert B. Smith, III, Esq.
P.O. Box 1887
Cleveland, MS 38732
(662) 846-6058

M. Earl Scales
Special Assistant Attorney General
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 220
Jackson, MS 39205-0220
(601) 359-4216

Boyd P. Atkinson
Guardian *Ad Litem*
P.O. Box 427
Cleveland, MS 38732
(662) 843-9766

John Cox, Esq.
Guardian *Ad Litem*
P.O. Box 608
Cleveland, MS 38730
(662) 843-8351

Sherry Van Liew, Former Director
Pattie C. Hendricks, Director
Mr. Ross
BOLIVAR COUNTY CASA
204 N. Pearman Ave.
Cleveland, MS 38732
(662) 846-6394

William K. Dossett, Esq.
125 South Court
P.O. Box 1494
Cleveland, MS 38732
(662) 846-0690

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with Jamison J., including:

Dr. Camille Baker Branton
Address and telephone number unknown

Dr. Cynthia Undesser
UNIVERSITY OF MISSISSIPPI MEDICAL CENTER
2500 N. State St.
Jackson, MS 39211
(601) 984-5820

LAUREL WOOD CENTER
5000 Highway 39 N
Meridian, MS 39301
(601) 483-6211

OUR HOUSE SHELTER
942 North St.
Jackson, MS 39202
(601) 355-0161

MILLCREEK BEHAVIORAL HEALTH SERVICES
P.O. Box 1160
Magee, MS 39111
(601) 849-4221

HOPE HAVEN
5102 Robinson Road Ext.
Jackson, MS 39204
(601) 376-0500

YOUTH VILLAGES
MEMPHIS BOYS TOWN
7410 Memphis-Arlington Rd.
Memphis, TN 38135
(901) 252-7800

SUNNY-BROOK CHILDREN'S HOME
P.O. Box 4871
Jackson, MS 39296
(601) 856-6555

SALLY KATE WINTER CHILDREN' HOME
317 North Division St.
West Point, MS 39773
(662) 494-4867

Lora Reeves
Sherry Azordegan
Cindy Hardy
Kelly Wilson
Dr. Joy Hogge

Sharon White
Monica Porter
Gayle Watts
Linda Raff
CATHOLIC CHARITIES OF JACKSON
(Our House shelter, Hope Have shelter)
P.O. Box 2248
Jackson, MS 39225
(601) 355-8634

Anita Williams, counselor
Address and telephone number unknown

Patricia Swafford, psychometrist
Address and telephone number unknown

Joyce Smith
Emily Tillman
Kaye Pepper
Alfredia Miller
Administrators and various fifth grade teachers
WATKINS ELEMENTARY
3915 Watkins Drive
Jackson, MS 39206
(601) 987-3594

Daniel Watkins
Ms. Mott
Administrators and various sixth grade teachers
POWELL MIDDLE SCHOOL
3655 Livingston Road
Jackson, MS 39213
(601) 987-3580

Beray Thigpen
Charles Bishop
Administrators and various seventh grade teachers
NORTHWEST JACKSON MIDDLE SCHOOL
7020 Medgar Evers Blvd.
Jackson, MS 39213
(601) 987-3609

Mr. S. Blackwell
Administrators and various eighth grade teachers
MORRIS-WILSON CAMPUS SCHOOL
P.O. Drawer D

Eads, TN 38028
Telephone number unknown

Dr. Cynthia Johnson
Administrators and various tenth grade teachers
CALLAWAY HIGH SCHOOL
601 Beasley Road
Jackson, MS 39206
(601) 987-3535

Administrators and various eleventh grade teachers
WEST HIGH SCHOOL
820 S. Osage St.
Wichita, KS 67213
(316) 973-3600

OAKLEY TRAINING SCHOOL
Transitional Living Center
2375 Oakley Drive
Raymond, MS 39154
(601) 857-2288

(f) Other

Shirley Crenshaw
Peggy Baker, Coordinator - Youth and Adult Services Commission
KANSAS DEPARTMENT OF SOCIAL AND REHABILITATIVE SERVICES
915 SW Harrison St.
Topeka, KS 66612
(785) 296-3959

3. Regarding John A.

(a) All members of John A.'s biological family, including:

Pamela Austin, biological mother
Address and telephone number unknown

James Magee, biological father
Address and telephone number unknown

(b) All current or former members of John A.'s foster families, including:

Willie and Velma Carpenter
Address and telephone number unknown

Edward and Anna Bolton
124 Taylor Road
Hattiesburg, MS 39401
(601) 584-7709

Angela Davis
Address and telephone number unknown

Martha Atkins
4312 Kreole Ave.
Moss Point, MS 39563
(228) 474-6258

Ophelia Coleman
Address and telephone number unknown

Seaborn and Annette Rainey
581 Richburg Road
Purvis, MS 39475
Telephone number unknown

- (c) All current or former DHS personnel or agents who have been involved with John A., including:

Mechille Henry, Regional Director
Region VI – Division of Family and Children Services
MARION COUNTY DEPARTMENT OF HUMAN SERVICES
226 Broad St., Suite 1
Columbia, MS 39429
(601) 736-6044

Jean Fertitta, Area Social Worker Supervisor
Beejee Dickson, Area Social Worker Supervisor
Ramona Lockett, Area Social Worker Supervisor
Josie Brown, LSW
Jessie Richardson, homemaker
Deanne Cunningham, LSW
Rosie Cox, aide
Barry Robertson, LSW
John Walker
Kim Rider, LSW
Sherita Bovastro, LSW
Terra McCarthy, LSW
Kathy Hightower
Melissa Lyons
Cindy Stubblefield

Sharron Robinson
Cindy Haslauer
Betty Rayner
Tena McCarty
Tabatha Enis
FORREST COUNTY DEPARTMENT OF HUMAN SERVICES
1604 West Pine Street
Hattiesburg, MS 39401
(601) 554-4354

Carrie Monsow, Area Social Worker Supervisor
DESOTO COUNTY DEPARTMENT OF HUMAN SERVICES
425 E. Commerce Street
Hernando, MS 38632
(662) 429-4461

Tabathas Cox, LSW
PONTOTOC COUNTY DEPARTMENT OF HUMAN SERVICES
P.O. Box 419
Pontotoc, MS 38863
(662) 489-4182

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*, or Court Appointed Special Advocates who have been involved with John A., including:

Judge Michael W. McPhail
FORREST COUNTY YOUTH COURT
P.O. Box 190
Hattiesburg, MS 39403
(601) 545-6075

James D. Johnson, Esq.
301 W. Pine St.
Hattiesburg, MS 39401
(601) 583-1937

Cliff Gaddis
Guardian *Ad Litem*
OFFICE OF THE DISTRICT ATTORNEY
109 Shady Lane
Hattiesburg, MS 39402
(601) 545-1551

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with John A., including:

MILLCREEK BEHAVIORAL HEALTH SERVICES
P.O. Box 1160
Magee, MS 39111
(601) 849-4221

Johnny Skinner, teacher
Lois Cox, social worker and therapist
Terry Tessena, therapist
MILLCREEK OF PONTOTOC
1814 Highway 15 North
P.O. Box 619
Pontotoc, MS 38863
(662) 488-1023

James Chastain, Director
Kristie Brister Medico, Legal Aspects Coordinator
MISSISSIPPI STATE HOSPITAL
PO Box 157-A
Whitfield, MS 39193
(601) 351-8018

Dr. Barbara Murray
Dr. Anthony Pollard
Dr. William Gasparrini
Marla Rogers
GULFPORT MEMORIAL HOSPITAL, BEHAVIORAL HEALTH UNIT
11150 Hwy. 49 North
Gulfport, MS 39503
(800) 831-1700

Mr. Jasper Gunn
YOUTH VILLAGES
MEMPHIS BOYS TOWN
7410 Memphis-Arlington Rd.
Memphis, TN 38135
(901) 252-7800

Dr. William P. Osborn
SASSAFRAS HILL COUNSELING CENTER
4824 Old Highway 11
Purvis, MS 39475
(601) 264-9515

Dr. Charles Greer
Dentist
Address and telephone number unknown

BACOT HOME FOR YOUTH
4021 Chicot St.
Pascagoula, MS 39581
(228) 769-0477

ALLIANCE HEALTH CENTER
5000 Highway 39 N
Meridian, MS 39301
(601) 483-6211

DESOTO SUNRISE HOMES
1281 Main Street
Southaven, Mississippi 38671
(662) 342-0155

HOPE HAVEN CHILDREN'S SHELTER
P.O. Box 37
Bay St. Louis, MS 39520
(228) 467-7945

PINE GROVE
2255 Broadway Drive
Hattiesburg, MS 39401
(601) 288-2273

DIXIE ELEMENTARY SCHOOL
790 Elks Lake Road
Hattiesburg, MS 39401
(601) 582-4890

HAWKINS ELEMENTARY SCHOOL
526 Forrest Street
Hattiesburg, MS 39401
(601) 583-4311

NICHOLAS HOBBS ACADEMY
7410 Memphis Arlington Rd
Memphis, TN 38135
(901) 252-7812

MERCY HOUSE MINISTRIES
21701 County Home Rd
Moss Point, MS 39562
(228) 588-2093

4. Regarding Cody B.

(a) All members of Cody B.'s biological family, including:

Betty L Hartfield, biological mother
4203 Knowles Ave. #120
Moss Point, MS 39563 (last known address)
Telephone number unknown

Calvin B. Burks, Sr., biological father
4203 Knowles Ave. #120
Moss Point, MS 39563 (last known address)
Telephone number unknown

Vinney Dread, cousin
Address and telephone number unknown

LauSunda Clark, maternal cousin
Address and telephone number unknown

Ann Jones, cousin
Address and telephone number unknown

Tonya Chapman, maternal aunt
Address and telephone number unknown

Quinesta McSwain, paternal aunt
Hattiesburg
Address and telephone number unknown

Annie and Anthony Keyes, maternal grandmother and husband
Address and telephone number unknown

Betty Simmons, maternal aunt
Address and telephone number unknown

Jake, Sean, Josh, Amber, Shantea, siblings
Address and telephone number unknown

(b) All current or former members of Cody B.'s foster families, including:

Beverly Bolton
5443 Winona Drive
Moss Point, MS 39563
(228) 475-9889

Bridget Thigpen
Babysitter while at Ms. Bolton's home
Address and telephone number unknown

Darryl and Melissa Boykin
2505 Pollock Ferry Road
Moss Point, MS 39562
Telephone number unknown

Romeo and Cassandra Brown
3614 Reeves Lane
Ocean Springs, MS 39564
(228) 872-8369

- (c) All current or former DHS personnel or agents who have been involved with Cody B., including:

Zadie B. Rogers, Regional Director
HARRISON COUNTY DEPARTMENT OF HUMAN SERVICES
1141 Bayview Avenue, 5th Floor
Biloxi, MS 39530
(228) 432-0225

Angela Ashford, Family Preservation Specialist
DEPARTMENT OF HUMAN SERVICES
DIVISION OF FAMILY AND CHILDREN SERVICES
750 North State Street
Jackson, MS 39202
(601) 359-4500

Tasha Jackson, Program Specialist
Mary Williams, Program Specialist
DEPARTMENT OF HUMAN SERVICES
IVE/CWS Eligibility Determination Unit
750 North State Street
Jackson, MS 39202
(601) 359-4500

Gwendolyn L. Beck, LSW
Deborah Stallworth
Gloria Richardson, LSW

Matt Matthews, Area Social Worker Supervisor
Yutaska Simpson, LSW
Sharon Carter, homemaker
Linda Smith, intake officer
Brenda Coe, Area Social Worker Supervisor
JACKSON COUNTY DEPARTMENT OF HUMAN SERVICES
P.O. Box 789
Pascagoula, MS 39568
(228) 769-3275

Carolyn Dodge
DEPARTMENT OF HUMAN SERVICES
DIVISION OF FAMILY AND CHILDREN SERVICES
Foster Care Review Program
750 North State Street
Jackson, MS 39202
(601) 359-4500

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*, or Court Appointed Special Advocates who have been involved with Cody B., including:

Nancy Fagan, Youth Court Abuse and Neglect Intake
Pat Brown
Cynthia Wilson, Youth Court Administrator
JACKSON COUNTY YOUTH COURT
4903 Telephone Road
Pascagoula, MS 39567
(228) 762-7370

Janice Perreault
Former Prosecutor
1253 Jackson Ave.
Pascagoula, MA 39567
(228) 938-9500

Brice Wiggins
Assistant District Attorney
19th Judicial District of Mississippi
4903 Telephone Road
Pascagoula, MS 39567
(228) 762-7370

Jim Smallwood
Prosecutor
4903 Telephone Road

Pascagoula, MS 39567
(228) 762-7370

Jennifer Harris, Esq.
Guardian *Ad Litem*
P.O. Box 510
Pascagoula, MS 39568
(228) 696-0228

Denise Lee
Guardian *Ad Litem*
Address and telephone number unknown

Terry Holtz, Esq.
P.O. Box 987
Ocean Springs, MS 39564
(228) 872-9224

Linda Boozer, Esq.
15 St. Andrews Dr.
Jackson, MS 39211
(601) 956-0392

Judge Alvin Chase
JACKSON COUNTY YOUTH COURT JUDGE
4903 Telephone Road
Pascagoula, MS 39567
(228) 762-7370

Judge Maxine Lawson-Conway
JACKSON COUNTY YOUTH COURT JUDGE
4903 Telephone Road
Pascagoula, MS 39567
(228) 762-7370

Judge Sharon W. Sigalas
JACKSON COUNTY YOUTH COURT JUDGE
4903 Telephone Road
Pascagoula, MS 39567
(228) 762-7370

Laura Singleton
Connie West Portas
JACKSON COUNTY CASA
4903 Telephone Road
Pascagoula, MS 39567

(228) 762-7370

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with Cody B., including:

Dr. J. Donald Matherne
CENTER FOR BEHAVIORAL MEDICINE
2710 Beach Blvd # 6D
Biloxi, MS 39531-4401
(228) 385-1827

Grace Sutterfield, nurse
WELL BABY CLINIC
Jackson County Health Department
4302 Hospital Road
Pascagoula, MS 39581
(228) 762-1117

Kim McClammy
CENTER FOR THE PREVENTION OF CHILD ABUSE
Address and telephone number unknown

Bridgett Pickett
FIRST STEP EARLY INTERVENTION PROGRAM
MISSISSIPPI STATE DEPARTMENT OF HEALTH
4302 Hospital Road
Pascagoula, MS 39581
(228) 762-1117

Marilyn Montgomery, shelter supervisor
RHONDA H. CRANE MEMORIAL YOUTH SHELTER
JACKSON COUNTY CHILDREN'S SERVICES COALITION
P.O. Box 1856
Gautier, MS 39553
(228) 762-7370

Dr. Michael Seymour
Dr. Andrew Ragula
SINGING RIVER HOSPITAL
2809 Denny Avenue
Pascagoula, MS 39581
(228) 809-5154

Ladd Chandler, teacher
Deanna Gray, speech pathologist

Dyane Held, physical therapist
Ronnie Bether, social worker
Delois Catchings, teacher assistant
SOUTH MISSISSIPPI REGIONAL CENTER
Project PRINTS
3257 Hwy. 90
Gautier, MS 39553
(228) 497-4568

Dr. Grzayna Wiericka
CHILDREN'S CLINIC OF PASCAGOULA
421 Delmas Ave.
Suite A
Pascagoula, MS 39567
(228) 762-8712

Angela Carpenter, LSW
MISSISSIPPI STATE DEPARTMENT OF HEALTH
4302 Hospital Road
Pascagoula, MS 39581
(228) 762-1117

(f) Other

PASCAGOULA POLICE DEPARTMENT
611 Live Oak Ave.
Pascagoula, MS 39567
(228) 762-2211

Venua Durr
reporter of abuse
4612 Main Street, #5
Moss Point, MS
Telephone number unknown

5. Regarding Mary, Tom, Matthew, and Dana W. (the "W. children")

(a) All members of the W. children's biological family, including:

Tracey Lee Williams, biological mother
Address and telephone number unknown

Markus Lee Williams, biological father
Address and telephone number unknown

Lawrence and Zelatra L. Williams, paternal uncle and wife

1069 Bala Chitto Road
Magnolia, MS 39652
(601) 783-3662

- (b) All current or former members of the W. children's foster families, including:

Clara Jones
Address and telephone number unknown

Brenda West
755 Glencross Drive Apt. 89
Jackson, MS 39206
Telephone number unknown

Ida Varnell
Address and telephone number unknown

- (c) All current or former DHS personnel or agents who have been involved with the W. children, including:

Mary Williams, Program Specialist
Mahalia Wright, Program Specialist
Tasha Jackson, Program Specialist
DEPARTMENT OF HUMAN SERVICES
IVE/CWS Eligibility Determination Unit
750 North State Street
Jackson, MS 39202
(601) 359-4500

Jennie N. Hall, LSW
Ronda Aldridge, LSW
Emily Brown, LSW
Carolyn Roberts, Area Social Worker Supervisor
Angela Fields, Area Social Worker Supervisor
Maggie Mixon, Area Social Worker Supervisor
HINDS COUNTY DEPARTMENT OF HUMAN SERVICES
4777 Medgar Evers Blvd.
Jackson, MS 39213
(601) 362-9892

Lacey O'Quin, LSW
WALTHALL COUNTY DEPARTMENT OF HUMAN SERVICES
P.O. Box 430
Tylertown, MS 39667
(601) 876-3238

Rachel Sullivan, foster care reviewer
DEPARTMENT OF HUMAN SERVICES
DIVISION OF FAMILY AND CHILDREN SERVICES
Foster Care Review Program
750 North State Street
Jackson, MS 39202
(601) 359-4500

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*, or Court Appointed Special Advocates who have been involved with the W. children including:

Judge Houston Patton
HINDS COUNTY YOUTH COURT JUDGE
P.O. Box 327
Jackson, MS 39205-0327
(601) 968-6663

Judge William Singletary
HINDS COUNTY CHANCERY COURT JUDGE
P.O. Box 686
Jackson, MS 39205
(601) 968-6548

John Gadow
P.O. Box 23662
Jackson, MS 39225
(601) 212-4115

Angela Gray Marshall
Guardian *Ad Litem*
P.O. Box 6971
Jackson, MS 39282
(601) 346-4488

Malcolm Harrison
P.O. Box 483
Jackson, MS 39205-0483
(601) 948-5030

Bridgette W. Wiggins
Special Assistant Attorney General
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 220
Jackson, MS 39205-0220

(601) 359-4247

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with the W. children, including:

Lou Moore, RN
UNACARE
University Nursing Associates, PLLC
1207 North West Street
Jackson, MS 39202
(601) 354-6654

John B. Jolly, Psy.D, ABPP
Clinical Psychologist
MISSISSIPPI COLLEGE
Box 4013
105 Lowrey Hall
Clinton, MS 39058
(601) 952-2995

Dr. Hill-Chance, therapist
Address unknown
(601) 894-5110

Dr. Philip Meredith
Steven R. Stafford, therapist
BRENTWOOD HEALTHCARE OF MISSISSIPPI
3531 Lakeland Dr.
Jackson, MS 39232
(601) 936-2024

Leah Yeatts
PINE GROVE COUNSELING CENTER OF JACKSON
2 Old River Place, Suite O
Jackson, MS 39202
(601) 355-5600

Dr. Diane Little
PINE GROVE
P.O. Box 16389
Hattiesburg, MS 39404-6389
(601) 288-2273

BROWN ELEMENTARY SCHOOL
146 E. Ash St.

Jackson, MS 39202
(601) 960-5326

EMMANUEL CHRISTIAN ACADEMY
1023 Langley Ave.
Jackson, MS 39204
(601) 969-9597

Mae Baity, teacher
JOHNSON ELEMENTARY SCHOOL
1339 Oak Park Drive
Jackson, MS 39213
(601) 987-3501

NORTH JACKSON ELEMENTARY SCHOOL
650 James M. Davis Dr.
Jackson, MS 39206
(601) 987-3528

Cheryl Brent, teacher
BRINKLEY MIDDLE SCHOOL
3535 Albermarle Road
Jackson, MS 39213
(601) 987-3573

SOUTH PIKE SCHOOL DISTRICT
250 West Bay Street
P.O. Box 71
Magnolia, MS 39652
(601) 783-3742

Connie McNab, principal
EVA GORDON ELEMENTARY SCHOOL
1175 N. Clark Street
Magnolia, MS 39652
(601) 783-5983

Emily Brewer, LSW
CHRISTIANS IN ACTION SHELTER
Jackson, MS
Address unknown
(601) 353-1942

- B. A copy of all documents, data compilations, and tangible things in the possession, custody, or control of Defendants, that may be used to support their claims or defenses, unless solely for impeachment:

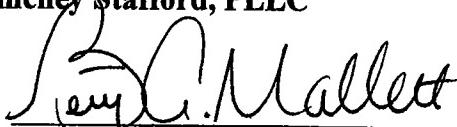
- i. Policies and Procedures of the Mississippi Department of Human Services, Division of Family and Children's Services.
- C. Insurance Information: The following documents may contain discoverable information:
1. Not applicable
- D. Experts: The Defendants have not yet retained an expert to testify in this case. However, Defendants reserve the right to do so and will timely supplement disclosures.
- E. Supplementation: Defendants reserve the right to supplement this disclosure as to the identity of expert witnesses, lay witnesses, documents, and tangible things which may be disclosed during the discovery process.
- F. Withholding: The only information being withheld at this time consists of correspondence between Defendants and their attorney and attorney notes, which are protected by attorney-client privilege.

The preceding disclosures express no opinion of and constitute no admission regarding the admissibility of any evidence in this or any other action.

Respectfully submitted,

**HALEY BARBOUR, as Governor of the State of
Mississippi; DONALD TAYLOR, as Executive Director
of the Department of Human Services; and
BILLY MANGOLD as Director of the Division of
Family and Children's Services**

McGlinchey Stafford, PLLC

By: 
Betty A. Mallett (MSB #8867)

CERTIFICATE OF SERVICE

I, Betty A. Mallett, do hereby certify that I have this day served a copy of the foregoing on counsel of record by United States Mail, postage prepaid to:

W. Wayne Drinkwater, Jr., Esq.
Melody McAnally, Esq.
BRADLEY ARANT ROSE & WHITE LLP
Suite 450, One Jackson Place
Post Office Box 1789
Jackson, MS 39215

Marcia Robinson Lowry, Esq.
Eric E. Thompson, Esq.
Shirim Nothenberg, Esq.
CHILDREN'S RIGHTS
404 Park Avenue
New York, New York 10016

Stephen H. Leech, Esq.
850 East River Place, Suite 300
Jackson, Mississippi 39215

John Lang, Esq.
LOEB & LOEB, LLP
345 Park Avenue
New York, New York 10154

Harold E. Pizzetta, III
Special Assistant Attorney General
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 220
Jackson, MS 39205

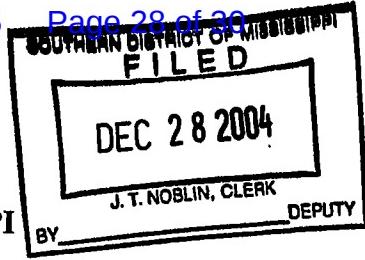
SO CERTIFIED, this the 28th day of December, 2004.



Betty A. Mallett

168373.1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**



**OLIVIA Y., By and
Through Her Next Friend,
James D. Johnson, et al.**

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN

**HALEY BARBOUR,
As Governor of the State of Mississippi;
DONALD TAYLOR, as Executive Director
of the Department of Human Services; and
BILLY MANGOLD, as Director of the Division
of Children's Services**

DEFENDANTS

NOTICE OF SERVICE

Notice is hereby given that Defendants Haley Barbour, Donald Taylor, and Billy Mangold have caused to be served in the above matter the following:

1. Defendants' Initial Disclosures to Plaintiffs.
2. Computerized documentation regarding Named Plaintiffs and accompanying Privileged Log pursuant to Order of the Court dated December 17, 2004.

This, the 28th day of December, 2004.

Respectfully submitted,

**HALEY BARBOUR, as Governor of the State of
Mississippi; DONALD TAYLOR, as Executive Director
of the Department of Human Services; and
BILLY MANGOLD as Director of the Division of
Family and Children's Services**

McGlinchey Stafford, PLLC

By: Betty A. Mallett (MSB #8867)

OF COUNSEL:

Attorney General Jim Hood
State of Mississippi
P.O. Box 220
Jackson, MS 39205-0220

McGLINCHEY STAFFORD, PLLC

Sam E. Scott (MSB #6567)
Betty A. Mallett (MSB #8867)
Amy Kebert Elder (MSB #99149)
City Centré South, Suite 1100
200 South Lamar Street (39201)
Post Office Box 22949
Jackson, Mississippi 39225
Telephone: (601) 960-8400
Facsimile: (601) 352-7757

CERTIFICATE OF SERVICE

I, Betty A. Mallett, do hereby certify that I have this day served a copy of the foregoing on counsel of record by United States Mail, postage prepaid to:

W. Wayne Drinkwater, Jr., Esq.
Melody McAnally, Esq.
BRADLEY ARANT ROSE & WHITE LLP
Suite 450, One Jackson Place
Post Office Box 1789
Jackson, MS 39215

Marcia Robinson Lowry, Esq.
Eric E. Thompson, Esq.
Shirim Nothenberg, Esq.
CHILDREN'S RIGHTS
404 Park Avenue
New York, New York 10016

Stephen H. Leech, Esq.
850 East River Place, Suite 300
Jackson, Mississippi 39215

John Lang, Esq.
LOEB & LOEB, LLP
345 Park Avenue
New York, New York 10154

Harold E. Pizzetta, III
Special Assistant Attorney General
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 220
Jackson, MS 39205

SO CERTIFIED, this the 28th day of December, 2004.



Betty A. Mallett

168841.1